

## TGS/AAS/MAA/CJN F. #2017R05903

## **U.S. Department of Justice**

United States Attorney Eastern District of New York

271 Cadman Plaza East Brooklyn, New York 11201

June 30, 2025

## By ECF

The Honorable Ann M. Donnelly United States District Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re: United States v. Huawei Technologies Co., Ltd., et al.

Criminal Docket No. 18-457 (S-3) (AMD)

## Dear Judge Donnelly:

The government writes to advise the Court that it has agreed to provide the information that the defendants request in their motion for a bill of particulars. (See ECF Nos. 533, 533-1.) Specifically, the government has agreed to provide: (i) the identities of the defendants' employees, officers, and/or agents who allegedly entered into the conspiracies charged in Counts One, Two, and Three of the Third Superseding Indictment; (ii) the specific money and/or property that was the object of the wire fraud conspiracy charged in Count Three; and (iii) specifics concerning the income generated from the pattern of racketeering activity that the defendants allegedly conspired to use or invest in the United States. (See id.) The parties are currently conferring regarding the timing of this disclosure.

In light of the above, the government respectfully submits that the defendants' motion for a bill of particulars is moot.

Respectfully submitted,

JOSEPH NOCELLA, JR. United States Attorney Eastern District of New York

By: <u>/s/</u>

Alexander A. Solomon
Meredith A. Arfa
Robert M. Pollack
Matthew Skurnik
Assistant United States Attorneys
(718) 254-7000

MARGARET A. MOESER Chief, Money Laundering and Asset Recovery Section, Criminal Division U.S. Department of Justice

By: /s/

Taylor G. Stout Morgan Cohen Jasmin Salehi Fashami Trial Attorneys

JENNIFER KENNEDY GELLIE Chief, Counterintelligence and Export Control Section National Security Division, U.S. Department of Justice

By: /s/

Christian J. Nauvel Ahmed Almudallal Sean O'Dowd Trial Attorneys

cc: Clerk of the Court (by ECF and Email)
Defense counsel of record (by ECF and Email)